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SEP 17 1999

September 17, 1999

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
445 12th St. S.W.
Washington, D.C. 20554

**Re: Calling Party Pays Service Offering in the Commercial Mobile Radio Service,
WT Docket No. 97-207**

Dear Ms. Salas:

Enclosed for filing is an original and four (4) copies of MCI WorldCom, Inc.'s
comments in the above-captioned proceeding.

In addition, please stamp the enclosed file copy and return to bearer.

Sincerely,



Elizabeth Yockus
(202) 887-3087

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**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of:

**Calling Party Pays Service Offering
in the Commercial Mobile Radio Services**

WT Docket No. 97-207

MCI WorldCom, Inc. Comments

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OFFICE OF THE SECRETARY

September 17, 1999

Summary

MCI WorldCom, Inc. recognizes the potential benefits of a calling party pays service offering, however there are many issues which need further consideration. Before entities like wireless resellers can offer services like calling party pays they need direct interconnection to the wireless service provider. Furthermore, the technical issues of how calling party pays calls would be recognized by other carriers and by individuals originating calls needs to be determined and the Commission should seek assistance from the North American Numbering Council on the specifics of how and if this would be possible. The Commission also needs to develop a mechanism for call compensation. Due to the lack of direct market pressure in a calling party pays environment on termination charges, MCI WorldCom believes these charges should be based on cost. The Commission needs to develop a specific proposal for industry comment.

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WT Docket No. 97-207

MCI WorldCom, Inc. Comments

I. Introduction

In its Notice of Proposed Rulemaking (NPRM),¹ released July 7, 1999, the Commission seeks comment on the removal of regulatory obstacles to offering consumers a Calling Party Pays (CPP) service option by Commercial Mobile Radio Service (CMRS) providers. CPP allows a CMRS provider to offer a service where the caller (party placing the call to the CMRS customer) pays the charges associated with terminating the call, such as the airtime charge. MCI WorldCom, Inc. (MCI WorldCom) agrees there are potential benefits from CPP for domestic wireless consumers, but MCI WorldCom also urges the Commission to take a much deeper look into many aspects of CPP. Specific questions should be asked of the North American Numbering Council (NANC) and the Commission should place on public notice, for industry comment, a specific proposal explaining how CPP calls would be recognized by carriers' networks and how call compensation would be handled for carriers not directly connected to the CMRS networks, such as wireless resellers, Competitive Local Exchange Carriers (CLECs) international carriers and interexchange carriers. Furthermore, competition may be hindered if termination charges are

¹In the Matter of Calling Party Pays Service Offering in the Commercial Mobile Radio Services, WT Docket No. 97-207, released July 7, 1999.

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not cost based.

Calling Party Pays may yield benefits to consumers by encouraging the use of wireless services. The Commission noted in the NPRM, “CPP could ultimately lead to wireless services becoming a true competitive alternative to the local exchange services offered by Incumbent Local Exchange Carriers (ILECs), particularly for residential customers.”² While it is certainly true that, given the correct decisions about allocation and use of spectrum, wireless technology might provide an alternative mode of competing with wireline technology, it is incorrect to conclude that CPP will create a world of true wireless to wireline competition. First, there is no number portability between the two modes of telephony. Second, and even more importantly, there can be no true competition to ILECs if, as is the case today, two-way spectrum is largely controlled by ILEC affiliates. For a truly competitive telecommunications market to exist, broader participation by other carriers and resellers is needed. Finally, CPP services cannot be an effective alternative or an effective competitive service unless the critical issues affecting compensation and identification of CPP traffic are resolved. Unfortunately, the Notice completely fails to raise these critical issues. In the comments that follow, MCI WorldCom discusses the issues that, in its view, must be raised, debated and resolved before CPP can be offered.

II. Resellers Should Be Able To Fully Participate In The Wireless Market and Offer CPP

A. CPP Must Be Available to Resellers

The Commission has recognized for decades the important role that resale plays in contributing to competitive markets. In the wireless context, the Commission has adopted a

²NPRM at 10.

specific rule, section 20.12 (b)³, that creates an affirmative obligation on CMRS carriers to engage in unrestricted resale.⁴ While it is true that the rule language is scheduled to “sunset,” the obligation to resell CMRS services would not similarly “sunset” since a reseller is a customer who is also a carrier. The reseller-as-customer is protected by the Communications Act requirements of sections 201(b) and 202(a). Those sections of the Act require that all charges, practices, classifications and regulations of carriers shall be just and reasonable, and that carriers may not engage in unjust or unreasonable discrimination.

The better view is that the elimination of the “unrestricted resale” rule simply means that resale now must be conducted in accordance with the other requirements imposed on carriers generally by the Act.⁵ This appears to be a proposition endorsed by licensees.⁶

If resale is currently mandated by the “unrestricted resale” rule and required by the Act, then the Commission needs to consider how CPP could be purchased for resale. Since the commission has predicted that CPP has the potential for widespread use, there can be no question but that CPP must be a service that resellers can offer to wireless customers.

B. Direct Interconnection To The Wireless Network is Necessary

³47 C.F.R. 20.12 (b).

⁴Interconnection and Resale Obligations Pertaining to a Commercial Mobile Audio Service, 11 FCC Rcd 18455 (1996); Bundling of Cellular Premises Equipment and Cellular Services, 7 FCC Rcd 4028 (1992).

⁵Interconnection and Resale Obligations Pertaining to Commercial Mobile Radio Services, 11 FCC Rcd 18455, 18468 (1996).

⁶Ex-parte letter from Mary Madigan Jones, Vice President, External Affairs, PCIA to Magalie Roman Salas, Secretary, Federal Communications Commission WT Docket No. 98-100, August 23, 1999 (As PCIA has repeatedly indicated. . . it does not oppose resale per se nor has it ever sought to eliminate the existence of a resale market).

First and foremost, wireless resellers need direct interconnection to the wireless network.

Without direct interconnection, options like calling party pays and prepaid services are simply not possible. The current network architecture prevents wireless resellers from providing call management, and instead wireless resellers receive a copy of charges approximately 30 to 90 days after the customer incurs the wireless charges. In order to offer CPP, a carrier must have access to traffic information, including the type of call detail that would allow a carrier to track traffic volumes, origination, destination, call duration, and other characteristics of the call. There has to be sufficient information for the carrier to know from which carriers, and in how much volume, the CPP call has originated. Moreover, this information needs to be available in real time. For example, resellers need on-line access to the licensees billing and provisioning systems for the purpose of viewing and capturing customer data. If the ability to view and access this data is not available, resellers will find as a practical matter, that they are shut out of the CPP "market." No reseller can do business in a CPP environment without an ability to track and measure CPP calls, and to know from where it can expect compensation.

Of course, one can easily imagine a more robust interconnection environment, where resellers have the option of switching calls through their own local switch and directly interconnecting with the Mobile Telecommunications Switch Office (MTSO) in the exchange of traffic. MCI WorldCom urges that, whatever decision is made in CPP, the Commission at minimum leave open the option of a more robust direct connection between resellers and CMRS licensees.

III. There Are Significant Issues Surrounding CPP Which Need Development and Support From a Concrete Record

A. Call Compensation

CPP is nothing more (or less) than an attempt to eliminate usage-sensitive "airtime" charges that wireless subscribers pay to CMRS carriers. In MCI WorldCom's view, there are alternative approaches that would produce the same policy results.⁷ But if CPP is the chosen vehicle, then there must be a mechanism under which the CMRS carrier can replace its airtime revenue stream with a revenue stream from the calling party. It is unclear from the notice how that would occur. One possibility is a billing and collection agreement between the wireless provider and the serving LEC.⁸ If this is the option, the logical difficulties involved in negotiating billing agreements with thousands of LECs would seem to limit the potential of CPP to become a useful and widespread calling option for wireless customers. Presently, calls through carriers who lack billing agreements would need to be blocked, and this would decrease the utility of CPP.⁹

⁷For example, the ILEC-CLEC reciprocal compensation model would alleviate the need for usage based airtime charges.

⁸Note that the serving LEC could be either an incumbent or a competitor.

⁹If the Commission proceeds down the path of billing and collection agreements as the mechanism by which carrier compensation is adjusted, then it is critically important that the Commission specify that ILECs must provide nondiscriminatory billing and collection agreements. In MCI WorldCom's view, this is critical for at least two reasons; (1) our experience with ILEC billing and collection agreements as an IXC suggests that a nondiscrimination rule would substantially improve the ability of the CMRS carriers to obtain a billing and collection agreement; and (2) most CMRS carriers are today controlled by ILECs, and non-affiliated CMRS carriers need a nondiscrimination rule to ensure that in creating such a rule, the Commission may act pursuant to its Title I authority, and need not re-regulate billing and collection under Title II.

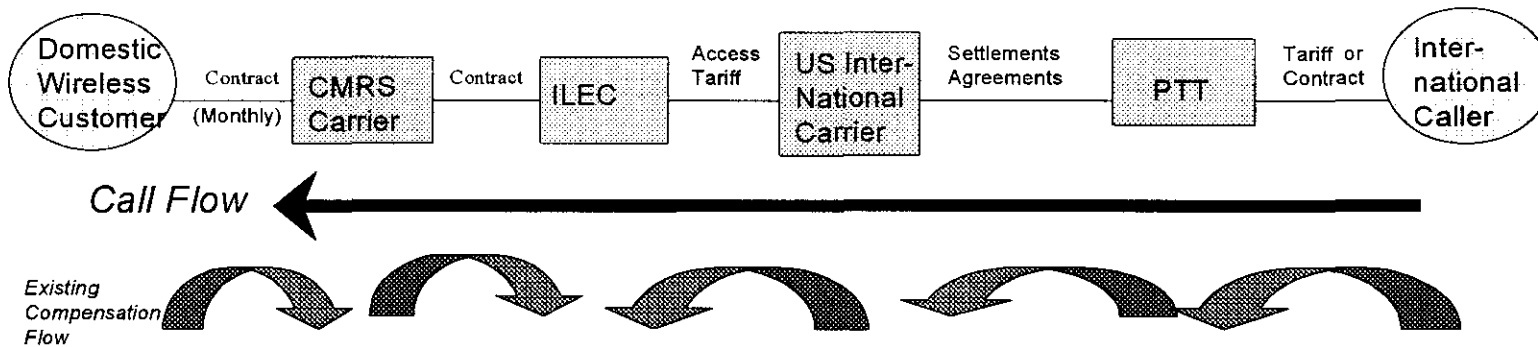
Alternatively, carrier compensation could be revised to eliminate these problems, but this requires the Commission to ask the as yet unasked questions about how compensation would work.

For CLECs, the issues are similar. There is likely no agreement or method in place for the CMRS carrier to bill the originating carrier if the originating carrier is a CLEC or any other carrier that is not directly connected to the CMRS provider because all communication goes through the ILEC. Without ILEC cooperation or agreements between the CMRS carrier and the CLEC, the billing information will not reach the CLEC and the CLEC will be unable to bill their customer for the CPP charges.¹⁰

The following charts illustrate these issues. Existing compensation systems must be changed to accommodate CPP in some way. Assuming the public policy should be to allow a U.S. wireless customer to accept an overseas originated call on a CPP plan, there is no mechanism in today's carrier compensation agreements that allow the revenue from the overseas customer to flow back to the U.S. CMRS provider. As will be discussed infra, this presents a special problem for U.S. international carriers.

¹⁰ If the Commission chooses a public policy path that seems to invite blocking of international and CLEC calls to CPP subscribers, it would appear to be a result at odds with the Commission's principal goal of fostering a wireless market that offers a full-fledged alternative to wireline telephony. Not only are wireless customers wedded to their telephone number and carrier due to the lack of portability, but they would also not be reachable from international destinations and an increasing portion of domestic callers as CLECs increase their presence over time.

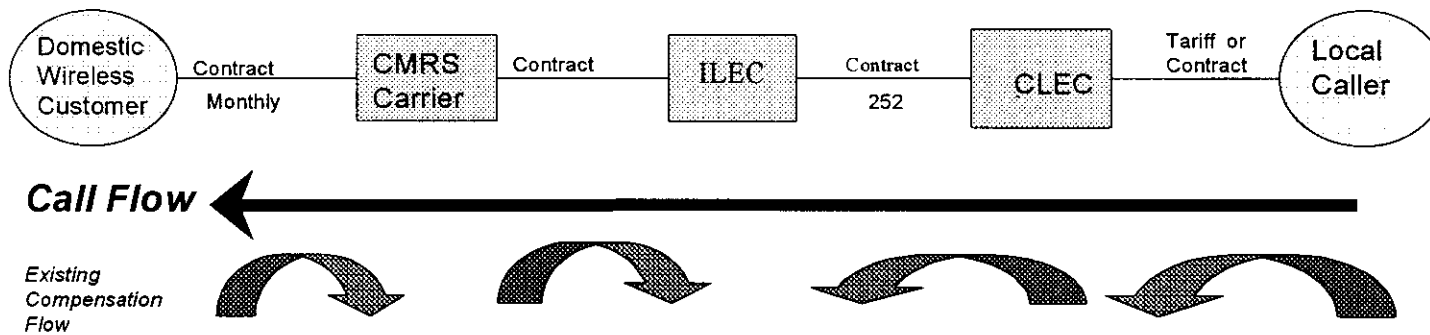
International Compensation Flow



Issues for International CCP

- Which carrier is responsible for the CCP payment to the CMRS provider and how is that carrier compensated for the CCP call?
- If the compensation flow changes in a CPP environment to pay the CMRS carrier, should there be a different settlement rate for inbound international CPP calls?
- How would the international PTT identify a CCP call destined for the US?
- Alternatively, should the public policy limit CPP service to calls between CMRS providers and ILECs' pursuant to individually negotiated billing and collection contracts? If so, do calls from other carriers (e.g., international calls, CLEC calls get blocked?)

Local Compensation Flow



Issues for Local CCP

- How does the CLEC bill its customer for CCP calls?
- How does the compensation flow change in a CPP environment?
- What is the compensation rate paid by the CLEC to the ILEC and the CMRS?
- How does the CLEC identify CCP calls?

B. Specific questions which should be referred to NANC

One of the most difficult aspects of call compensation is the need to identify and track CPP calls. As the Commission indicated, one method of doing so is to utilize the numbering plan to segregate CPP calls. To explore this issue, the Commission needs to request assistance of NANC in developing a specific plan for how, and, if a non-geographic NPA can be established. Specifically, the Commission would need to request information on the infrastructure of the administration system and the possible number assignment practice which would be feasible, who would administer the numbers and how this administrator would be paid, who would be in charge of the relief planning, what would be the impact on the numbering plan¹¹, and when NANC advises implementation. Additional questions which the Commission should request NANC assistance on are: whether a system where NXXs within the NPA could be distributed in a manner that would allow carriers to determine the local calling area of the CPP subscriber, whether numbers within the NPA should be assigned by 10,000 number blocks, 1,000 number blocks or individual numbers. Additionally, the NANC should investigate what other ramifications on local calling plans and carrier compensation are foreseeable.

Although MCI WorldCom understands the potential benefits of CPP there is a potential adverse impact that a non-geographic NPA may have on the numbering resources. Due to the limited quantity of numbers remaining in the North American numbering plan as it inches toward

¹¹The creation of a service specific area code creates a potential conflict with the Commission's efforts to optimize the numbering resource and should be investigated by NANC. See Numbering Resource Optimization, Notice of Proposed Rulemaking, CC Docket No. 99-200, Released June 2, 1999.

exhaust early in the next century, MCI WorldCom opposes the any proposal that NPAs be given to each carrier. One NPA (almost 8 million numbers) for the initial stage of CPP should be sufficient.

Once a non-geographic NPA is in place for all CPP calls, consumers will recognize the NPA numbers as CPP calls just as they recognize 1-800 or 1-888 as toll free numbers, and 1-900 or 1-976 as a pay-per-call number. Furthermore, because large numbers of CMRS providers serve multi-state areas this type of notification plan would save multi-state carriers from the need to comply with multiple and possibly conflicting state policies. Additionally, a non-geographic NPA would allow both domestic and international carriers to identify the call as a CPP call and to charge the consumer accordingly.

IV. International Termination Issues Illustrate The Carrier Compensation Issues That Must Be Resolved

It is critical that the Commission ensure that CPP can be successfully implemented. In order for U.S. facilities-based carriers, as well as resellers, that utilize their networks to terminate inbound traffic to CPP subscribers in the U.S. from overseas points, carriers must be able to differentiate CPP traffic from other terminating traffic. As explained below, the inability to adequately identify terminating CPP traffic would prevent U.S. international carriers from fully recovering the costs of terminating international traffic and could encourage distortion of inbound international traffic terminating in the United States. This could result in higher costs for all U.S. consumers.

A. The Implementation of CPP Could Have a Serious Impact on the U.S.

International Telecommunications Market

International traffic is typically exchanged between U.S. and foreign carriers pursuant to international termination rate agreements, whereby the U.S. international carrier and the foreign carrier bilaterally agree to pay each other a specific rate for terminating international traffic in each other's market.¹² For example, if a telephone call is placed by a customer located in France to a customer in New York, a French carrier will originate the call and carry it either to a theoretical mid-point in the Atlantic Ocean or all the way to the United States, then pass the call to a U.S. carrier for termination in the United States. The French carrier then pays the U.S. carrier an international termination rate for terminating the call to the U.S. customer. The U.S. international carrier typically passes the call to the terminating customer's local carrier, usually a Local Exchange Carrier (LEC). Whatever charge the U.S. international carrier must pay to the LEC, such as an interconnection charge is expected to be covered by the international termination rate paid to the U.S. international carrier by the French carrier.

Currently, in the U.S., the terminating wireless customer pays the airtime charges for terminating the call on a wireless network. Under a CPP system, however, the terminating CMRS provider will not recover its airtime costs from the terminating customer, but instead may, depending upon how the Commission addresses competition issues, expect to recover its cost from

¹²For a detailed explanation of settlement rates, see *Cable & Wireless et al. v. FCC*, 166 F.3d 1224, 1226-27 (D.C. Cir. 1999). See also *International Settlement Rates*, 12 FCC Rcd 19806 (1997), aff'd sub nom., *Cable and Wireless et al. v. FCC*, 166 F.3d 1224 (D.C. Cir. 1999)

the U.S. carrier that hands it the call.¹³ However, international termination rates with many countries have recently decreased to levels close to the actual cost of terminating an international call on a wireline network.¹⁴ For example, as of September 1, 1999, MCI WorldCom has published international termination rates of seven cents per minute in effect with carriers in the Netherlands and Hong Kong, and six cents per minute in Sweden.¹⁵ More significantly, unpublished market-based international termination rates on many routes are significantly lower than these levels. Such low international termination rates are based on the cost of terminating traffic on the U.S. wireline network. If U.S. international carriers were required to pay a higher interconnection charge to CMRS providers to terminate international calls to CPP customers, such low international termination rates would not adequately cover the costs incurred by U.S.

¹³As the Commission recognized in the NPRM, the rates for CPP are not subject to direct competition because the calling party cannot choose which CMRS network the call will terminate on. For the same reasons, competitive pressure does not exist on the rates that CMRS providers might charge other carriers for calls terminating on their networks. NPRM at ¶ 53. *See also* U.K. Office of Telecommunications, *OFTEL Submission to the Monopolies and Mergers Commission Inquiry into the Prices of Calls to Mobile Phones*, May 1998, at ¶¶ 1.8, 1.12 (the U.K. telecommunications regulator found that call termination on a mobile network is a bottleneck service and that CPP rates are not competitive).

¹⁴International termination rates, traditionally called settlement rates were historically set above the cost of terminating an international call as a result of limited competition overseas, so in the past, higher costs for terminating call on mobile networks may have been adequately covered.

¹⁵*See Consolidated Accounting Rates of the United States*, September 1, 1999 (available on the International Bureau's Web Site at <http://www.fcc.gov/ib/td/pf/consolar.xls>)

international carriers for terminating calls to CPP subscribers.¹⁶

U.S. international carriers must have the ability to charge higher international termination rates for terminating inbound international calls to CPP subscribers than for calls terminating on wireline networks or to non-CPP wireless customers. Otherwise, U.S. international carriers might have to charge a higher blended termination rate for all calls, which would result in wireline terminating customers paying more and in effect, subsidizing wireless terminating customers. The originating foreign carrier, however, will not agree to pay a higher international termination rate to the U.S. international carrier unless the foreign carrier can verify the call's destination, and, therefore, bill its customer a higher rate for placing the call to a CPP subscriber in the United States. Therefore, in order to charge different cost based rates, both to the calling party overseas, as well as to the overseas carrier, it is critical for the Commission to implement a workable mechanism to identify both calls that terminate to CPP subscribers in the U.S.

Moreover, the failure to enable U.S. international carriers to charge a differential international termination rate for CPP calls to U.S. customers would encourage "tromboning," a distortion of the CPP and international telecommunications markets in the United States. Tromboning is a method of arbitrage that is encouraged when domestic rates for terminating calls on wireless networks are higher than inbound international termination rates. When a subscriber in the U.S. calls a CPP subscriber, the originating LEC, rather than pay a high termination rate to the

¹⁶Indeed, U.S. international carriers would lose revenue for each in-bound international call to CPP subscribers in the U.S. if the rate charged by the CMRS provider for terminating the call is higher than the international termination rate that the U.S. international carrier obtains from the foreign carrier. Such a perverse effect is a very real possibility.

terminating CMRS provider, could simply send the call overseas -- over its own facilities or through an arrangement with another carrier -- and then have the call sent back to the U.S. by handing it off to an unsuspecting U.S. international carrier for termination in the U.S. The call looks like an inbound international call, and the U.S. international carrier is paid a international termination rate but must then pay the higher CPP termination charge to the CMRS provider.

The originating LEC, therefore, avoids having to pay the CPP termination charge and incurs only the facilities costs of carrying the call overseas and back to the U.S. The U.S. international carrier would suffer from this type of distortion by incurring the higher costs for terminating the call on the CMRS network. Again, U.S. consumers would suffer because if U.S. International carriers must terminate such traffic at a loss, they would be forced to subsidize the losses by increasing rates for the other services.

Finally, U.S. international carriers currently pay higher international terminations to numerous foreign carriers for terminating calls on wireless networks overseas (where CPP is the norm) as compared to the rates for terminating calls on wireline networks. This exacerbates U.S. carriers' international termination outpayments to these countries. It would be particularly inequitable for U.S. carriers to continue to pay higher rates for out-bound calls terminating on wireless networks overseas if U.S. international carriers could not charge a commensurate rate for terminating in-bound calls to CPP subscribers in the U.S.

B. A Dedicated NPA Would Facilitate the Ability of U.S. International Carriers to Identify CPP Calls Terminating in the United States

In order for U.S. international carriers to identify and charge appropriate international termination rates for calls to CPP subscribers in the United States, their foreign correspondents

must bilaterally agree to pay the higher international termination rates for such traffic. The foreign carrier will not agree to do so unless it is able to bill and collect at a higher rate from its originating customer. Therefore, no foreign carrier will be willing to agree to different international termination rates for CPP traffic unless its U.S. correspondent provides a workable mechanism for differentiating the calls terminating in the United States to a CPP subscriber. The only workable method for identifying CPP calls is to assign all CPP subscribers to a specific NPA.¹⁷ If all inbound international CPP calls are assigned to a designated NPA, overseas carriers could easily identify and bill for those calls. Without this technically straightforward method for identifying CPP calls, foreign correspondents will simply be unwilling to support the implementation of CPP, and U.S. carriers and their customers would suffer the consequences. Unless overseas carriers have a mechanism and an incentive to charge more for calls terminating to U.S. CPP subscribers, the success of CPP in the U.S. will be in jeopardy.

Therefore, it is critical that the Commission does not implement CPP unless it also requires CPP subscribers to be assigned to a designated NPA to (1) allow CPP subscribers to receive calls from overseas callers and (2) avoid adversely impacting U.S. international consumers and carriers, and to prevent distortion of CPP traffic in the United States.

A non-geographic NPA could be established for CPP. Just as toll-free services (800 and 888 services) have their own NPA, and pay per call services offered in the 900 and 976 NPA, CPP

¹⁷For this reason, in Europe, where all calls terminated on wireless networks are paid for by the calling party, wireless subscribers are assigned to non-geographic "city codes," the equivalent of NPAs in the United States.

could be given a non-geographic NPA. MCI WorldCom believes this plan may be workable, but there are significant issues which need to be developed and supported by a concrete record.

V. CPP Termination Rates Should be Based on Cost

The only pressure for a CPP subscriber to switch to another CMRS carrier, with lower rates than its current CMRS provider, is if the rates charged by the CMRS provider to the interconnecting and/or billing carriers, and hence to the wireless subscriber, are so excessive that the CPP subscriber is not receiving any calls.¹⁸ Thus, only indirect market pressure on mobile termination rates exists and, therefore, the potential for unreasonably high rates. In order to account for the lack of market pressure on terminating rates, MCI WorldCom urges the Commission to ensure that terminating charges are cost based. This would ensure that CPP callers would not face unreasonably high termination prices, and for CPP to be an unused service. The Commission does not necessarily need to fully regulate termination rates as it does, for example, the terminating interstate access rates of ILECs. But it must take regulatory steps to guard against overcharging. This could include a policy that 208 complaints received will routinely be referred to the commission's "rocket docket" enforcement process. It might also include an announcement of a presumptively lawful benchmark rate, below which the termination price is presumed lawful, and above which, the carrier must be prepared to cost justify its rate. Further regulation appears unwarranted.

¹⁸The absence of number portability is a further barrier to subscribers changing carriers.

VI. Commission must enable resellers to provide notice on CPP calls

In its Notice, the Commission seeks comment on a range of questions about how wireline consumers would be notified that, for the purposes of calling a CPP subscriber, the wireline subscriber will pay for the “airtime” charges formerly paid by the wireless subscriber. For wireless resellers to be able to participate in CPP offerings, a notification message will also have to be provided for every call destined for a resale CPP customer. That can occur in one of two ways. Either the CMRS or serving LEC will need to deliver a reseller-specified message to wireline subscribers calling the reseller’s customer, or the CMRS provider must provide interconnection sufficient to permit the reseller to prompt the message for calls directed to its customers. In any event, resellers must be in a position to specify the message (regardless of whether the FCC mandates its content) and to monitor the network to ensure that the appropriate notice is given. It is simply insufficient consumer protection for resellers to blindly rely on other carriers in this circumstance.

VII. Conclusion

The Commission’s Notice of Proposed Rulemaking regarding the calling party pays service option released July 7, 1999, has the potential to bring more competition to wireless and wireline communications services. However, the benefits of calling party pays cannot be recognized without direct interconnection for wireless resellers. NANC input should be sought by the Commission to assist in analyzing how CPP will affect number utilization. Finally, the Commission must address how call compensation would flow. Once this proposal has been established, then the Commission should seek further comment input from the industry on implementation.

Comments of MCI WorldCom, Inc.
September 17, 1999

Respectively submitted,

A handwritten signature in cursive script, appearing to read "Elizabeth Yockus".

MCI WORLDCOM, INC.

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Mary L. Brown
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Date: September 17, 1999

CERTIFICATE OF SERVICE

I, Vivian Lee, do hereby certify that copies of the foregoing Comments of MCI WorldCom, Inc. In the Matter of Calling Party Pays Service Offering in the Commercial Mobile Radio Services were sent, on this 17th day of September, 1999, via first-class mail, postage pre-paid, to the following:

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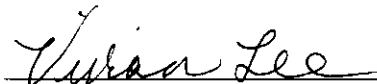
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****HAND DELIVERED****

A handwritten signature in cursive script, appearing to read "Vivian Lee", is written over a horizontal line.

Vivian Lee